

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE: WORLD TRADE CENTER
DISASTER SITE LITIGATION
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Docket No.: 21 MC 102 (AKH)

NOTICE OF MOTION

THIS DOCUMENT APPLIES TO ALL
WORLD TRADE CENTER DISASTER SITE
LITIGATION
-----X

PLEASE TAKE NOTICE THAT upon the Declaration of Denise A. Rubin dated August 24, 2011 and the exhibits annexed thereto, this Court's Order of August 19, 2011, and pursuant to Fed. R. Civ. P. 60 (b)(1) the undersigned will request this Court to reconsider it's Order of August 22, 2011 and upon such reconsideration:

1. To amend and revise the August 19, 2011 Order, annexed at Exhibit "A", related to the allocation of costs among plaintiffs' counsel in the 21MC102 docket to read substantially as the Proposed Order annexed to these papers as Exhibit "B"; and
2. Such other and additional relief as this Court deems just and proper.


Dated: New York, New York
August 24, 2011

Respectfully submitted,

WORBY GRONER EDELMAN & NAPOLI BERN, LLP
Plaintiffs' Co-Liaison Counsel


Denise A. Rubin (DR-5591)

350 5th Avenue, Suite 7413
New York, New York 10118
(212) 267-3700

The motion is denied. These lawsuit, approximately 2,000
Number, cannot be prosecuted effectively unless liaison
counsel's direct costs are equitably shared as a server basis.
My order of August 19, 2011 so provides. Movant's argument based
on consensus as inequitable and partial sharing is rejected.
8/29/11 

To:

Gregory Cannata
The Law Firm of Gregory J. Cannata
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Robert Grochow
Robert A. Grochow, P.C.
233 Broadway, 5th Floor
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Defendants Liaison Counsel

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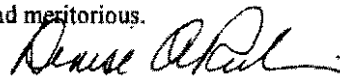
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MOTION FOR RECONSIDERATION

WORBY GRONER EDELMAN & NAPOLI BERN, LLP

Attorneys for : numerous Plaintiffs
350 5th Avenue, Ste. 7413
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(212) 267-3700

The undersigned attorney hereby certifies, pursuant to Fed. R. Civ. P. 11 that I have read the within papers and that to the best of my knowledge and belief they are factually correct and meritorious.



Attorney name: Denise A. Rubin (DR5591)

PLEASE TAKE NOTICE:

☐ NOTICE OF ENTRY

that the within is a (certified) true copy of an _____ duly entered in the
office of the clerk of the within named court on _____ 200__.

☐ NOTICE OF SETTLEMENT

that an order _____ of which the within is a true copy, will be
presented for settlement to the HON. _____ one of the judges of the
within named Court, at _____ on _____ 200__ at _____ O'clock ____M.

Dated, _____

Yours, etc.

WORBY GRONER EDELMAN & NAPOLI BERN LLP